



State of Ohio Environmental Protection Agency

**Southwest District Office**

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May 26 8 03 AM '99  
George V. Voinovich  
Governor  
FERNALD  
LOC: NC-01159

May 25, 1999

RE: DOE FEMP  
COMMENTS:  
A2PIII PSP

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 1, 1999 submittal, "Project Specific Plan for Area 2, Phase III Certification Sampling". Attached are Ohio EPA's comments on the document.

If you have any questions, please contact Donna Bohannon, Michelle Waller or me.

Sincerely,

*Michelle Waller*  
*for*

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Ruth Vandergrift, ODH  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO

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**PROJECT SPECIFIC PLAN FOR  
AREA 2, PHASE III CERTIFICATION SAMPLING**

1. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: General              Pg. #:              Line #:              Code: C  
Original Comment #:  
Comment: The northern area of A2P3 which has been found to contain Radium-226 contamination is not a *hot spot*, and will need to be addressed entirely separate from this PSP, not as the proposed addendum. All references to this area need to be removed from this document.
  
2. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: General              Pg. #:              Line #:              Code: E  
Original Comment #:  
Comment: Please provide numbers for each line of text in future documents.
  
3. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.1.1              Pg. #: 2-2              Line #:              Code: C  
Original Comment #:  
Comment: The partial paragraph at the top of page 2-2 discusses the target analyte list, but does not include the parameters in the text. Please provide this information or reference Table 3-1.
  
4. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.1.2              Pg. #: 2-2              Line #: first parg.              Code: C  
Original Comment #:  
Comment: As previously mentioned in Ohio EPA's comments on DOE's A2P3 CDL, the selection of certification sampling locations and the method used is appropriate. However, through review, there appears to be large spaces or gaps between the sampling points which is apparent in the overall design of the certification sampling locations in each stockpile. In addition, stockpiles do not appear sufficiently bounded. Ohio EPA suggests additional sampling locations to ensure complete certification of each stockpile.
  
5. Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.3              Pg. #: 2-2              Line #:              Code: C  
Original Comment #:  
Comment: What type of equipment will be used to collect samples? Please specify.

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Page 3

6. Commenting Organization: OEPA Commentor: OFFO  
Section #: 2.3 Pg. #: 2-3 Line #: first partial parg. Code: C  
Original Comment #:  
Comment: The text refers to duplicate samples being the same as split samples. In the true definition of *duplicate* and *split*, they are both different types of samples. Please clarify.
7. Commenting Organization: OEPA Commentor: OFFO  
Section #: 2.3 & Appendix B Pg. #: 2-3 Line #: first full parg. Code: E  
Original Comment #:  
Comment: In the first full paragraph, it discusses the footprint CU samples and explains that they "will be collected at the planned depth identified in Appendix B." The referenced Appendix should be D. Please correct.
8. Commenting Organization: OEPA Commentor: OFFO  
Section #: 2.3 Pg. #: 2-3 Line #: sec'd full parg. Code: C  
Original Comment #:  
Comment: The text states that up to one foot in radius is the distance to be used for moving a sampling location when encountering surface or subsurface obstacles. However in Section 4.1 of the A2P3 CDL on page 4-1 and in Section 2-2 of the PSP on page 2-2, the minimum distance is stated as three feet. Please correct.
9. Commenting Organization: OEPA Commentor: OFFO  
Section #: 2.3 Pg. #: 2-3 Line #: last sent. Code: C  
Original Comment #:  
Comment: What is meant by the term *analytical release*? Please explain.